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April 29, 2009

Air and Radiation Docket  
Docket ID No. EPA-HQ-OAR-2009-0211  
Environmental Protection Agency  
Mailcode: 6102T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

The Honorable Lisa Jackson  
Administrator, Environmental Protection Agency

Dear Ms. Jackson:

This comment is submitted in reference to the petition to raise the level of ethanol allowed to be put in motor gasoline from 10 percent to 15 percent or some intermediate level. I urge you to deny this petition on the grounds that the available information on the impact of higher ethanol blends does not support the contention that higher blends will not contribute to increased air pollution and to failure of motor vehicle engines, pollution control equipment, and smaller equipment such as generators.

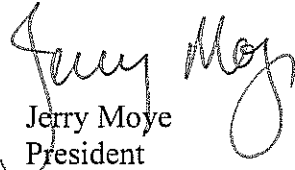
I refer you to the study conducted by the Department of Energy entitled "Effects of Intermediate Ethanol Blends on Legacy Vehicles and Small Non-Road Engines, Report 1 – Updated," February 2009, conducted by the National Renewable Energy Laboratory. While some view this study as supportive of higher ethanol blends, in fact the report specifically states that it is the "first phase" of DOE testing on the impact of intermediate ethanol blends on vehicles and other engines. The report states: "Recognizing the need for a wide range of additional tests, DOE is sponsoring a number of other studies," on emissions and catalyst temperatures, emissions of various gasolines and ethanol blends, evaporative emissions, full-useful-life emissions, driveability, and fuel system materials compatibility. With so many reports pending, it is difficult to believe that an "appropriate level of scientific and technical information exists in order for the Administrator to determine whether the use of E15 will not cause or contribute to a failure of any emission control device or system over the useful life of any motor vehicle or motor vehicle engine" or non-road vehicle or non-road engine. I believe this applies to blends between E10 and E15 as well.

The ethanol blend question is a matter of great concern to us because we operate motor vehicles which could be impaired, or have their pollution control systems impaired, by higher blends. In addition, we work with many independent family farmers who raise chickens to market weight for us. Systems for feeding chickens and controlling the environment of the production facilities are electrically operated. Many farmers have generators to provide power in event of a power outage. The DOE study of generators running on E15 and E20 shows that exhaust temperatures increased with increasing ethanol levels and the emission of nitrogen oxide also increased. We share the concern of the manufacturers that higher ethanol blend have not been proven to be harmless to these critical units.

In reference to EPA's request for comments on the possibility of allowing E15 for some systems and not others, we do not believe it would be practical. Many of our operations and many of the independent family farms are located in rural areas with adequate but not extensive fuel infrastructure. It is unrealistic to think that gasoline stations could carry different ethanol blends in addition to the existing grades of gasoline and diesel fuel. In many cases, farmers would have no option but to fuel their generators with blends that have been shown to be deleterious to their operation.

On behalf of Cobb-Vantress, Inc., I urge you to consider all these factors and keep the ethanol limit at 10 percent.

Sincerely,



Jerry Moye  
President